

Paul J. Labov  
**FOLEY & LARDNER LLP**  
90 Park Avenue  
New York, New York 10016-1314  
Telephone: (212) 682-7474  
Facsimile: (212) 687-2329  
E-mail: plabov@foley.com  
*Counsel for Whitebox Asymmetric Partners, LP and  
Whitebox Multi-Strategy Partners, LP*

Erika L. Morabito  
**FOLEY & LARDNER LLP**  
3000 K. Street, N.W., Suite 600  
Washington, D.C. 20007-5109  
Telephone: (202) 295-5300  
Facsimile: (202) 672-5399  
E-mail: emorabito@foley.com  
*Counsel for Whitebox Asymmetric Partners, LP and  
Whitebox Multi-Strategy Partners, LP*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION, *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 18-23538 (RDD)

(Jointly Administered)

---

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E LLC (0204); FBA Holdings Inc. (6537); Innoval Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC (5554); Sears STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816); The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE**

**PLEASE TAKE NOTICE** that the undersigned appear in the above-captioned chapter 11 cases as counsel to Whitebox Asymmetric Partners, LP, and Whitebox Multi-Strategy Partners, LP (collectively, “Whitebox”), and pursuant to rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and section § 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”), respectfully request that all notices, pleadings and other papers served or required to be served in these proceedings, be served upon:

Paul J. Labov, Esq.  
FOLEY & LARDNER LLP  
90 Park Avenue  
New York, New York 10016  
E-mail: [plabov@foley.com](mailto:plabov@foley.com)  
Telephone: (212) 682-7474  
Facsimile: (212) 687-2329  
E-mail: [plabov@foley.com](mailto:plabov@foley.com)

And

Erika L. Morabito, Esq.  
FOLEY & LARDNER LLP  
3000 K. Street, N.W., Suite 600  
Washington, D.C. 20007-5109  
Telephone: (202) 295-5300  
Facsimile: (202) 672-5399  
E-mail: [emorabito@foley.com](mailto:emorabito@foley.com)

**PLEASE TAKE FURHTER NOTICE** that pursuant to 11 U.S.C. § 1109(b), the foregoing request includes notices and papers referred to in the Bankruptcy Rules and additionally includes, without limitation, notices of any application, complaint, demand, hearing, motion, order, pleading or other request, formal or informal, whether transmitted or conveyed by mail, telephone or otherwise.

**PLEASE TAKE FURTHER NOTICE** that this Notice of Appearance and Request for Notice (the “Notice”) shall not be deemed or construed to be a waiver of the rights of Whitebox (i) to have final orders in non-core matters entered only after de novo review by a District Judge, (ii) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (iii) to have a District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) to demand formal service of process on Whitebox in accordance the Federal Rules of Bankruptcy Procedure and/or Federal Rules of Civil Procedure, or (v) to assert any other rights, claims, actions, setoffs, or recoupments to which Whitebox is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

New York, New York  
Dated: July 9, 2019

Respectfully submitted,

/s/ Paul J. Labov  
Paul J. Labov, Esq.  
FOLEY & LARDNER LLP  
90 Park Avenue  
New York, New York 10016  
E-mail: plabov@foley.com  
Telephone: (212) 682-7474  
Facsimile: (212) 687-2329

*Counsel for Whitebox Asymmetric Partners, LP and  
Whitebox Multi-Strategy Partners, LP*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing *Notice of Appearance and Request for Service of Papers* was served on this, the 9th day of July, 2019 on all parties entitled to receive service through the Court's ECF system.

/s/ Paul J. Labov  
Paul J. Labov, Esq.